



## Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact [support@jstor.org](mailto:support@jstor.org).

tempt, it is held, in *Smith v. Connecticut R. & L. Co.* 80 Conn. 268, 67 Atl. 888, 17 L. R. A. (N. S.) 707, that his act is not the proximate cause of his resulting injury if, upon seeing his design, the motorman because of his inexperience becomes confused, releases the brake, and causes the car to increase its speed, so that it strikes the wagon, which it would not do if he used ordinary care.

---

**Abutting Owner—Obstructions in Street—Injury to Pedestrian—Liability.**—The abutting property owner is held, in *Kampmann v. Rothwell* (Tex.), 109 S. W. 1089, 17 L. R. A. (N. S.) 758, to be liable for injury to a pedestrian in falling over a covering which constitutes an obstruction to footmen, placed by an independent contractor over a repaired sidewalk, without signals or guard to protect the public from injury after dark.

---

**Money Obtained by Fraud—Recovery—Limitations.**—The fact that money is obtained by fraud is held, in *Boyd v. Beebe* (W. Va.) 61 S. E. 304, 17 L. R. A. (N. S.) 660, not to prevent the running of the statute of limitations, against an action to recover it back, from the consummation of the transaction, unless investigation is prevented by affirmative efforts on the part of the wrongdoer, mere silence not being sufficient.

---

**Claim against Attorney for Money Collected—Limitations—Running of Statute.**—In the absence of fraudulent concealment, it is held, in *Goodyear Metallic Rubber Shoe Co. v. Carpenter* (Vt.) 69 Atl. 160, 17 L. R. A. (N. S.) 667, that the the statute of limitation began to run against a claim upon an attorney for money collected by him from the time the money should have been paid over, which is within a reasonable time after the collection, under the circumstances of the case.

---

**Contracts—Performance—Recovery of Pay.**—One employed to build up a street to a certain level is held, in *Duncan v. Cordley* (Mass.), 85 N. E. 160, 17 L. R. A. (N. S.) 697, to be entitled to his pay when he has constructed the street to that level according to specifications, although, because of the action of the elements or the nature of the soil, it subsequently settles below that level

---

**Municipal Corporation—Elevators in Police Station—Liability for Negligence.**—The operation by a municipal corporation of an elevator in a police station is held, in *Wilcox v. Rochester*, 190 N. Y. 137, 82 N. E. 1119, 17 L. R. A. (N. S.) 741, to be part of its governmental duty, for negligence in which it is not liable to an individual injured thereby.